

1 answer.

2 A. Mr. Laurino.

3 Q. All right. Getting back to the conversation

4 that you had with Mr. Bayad. You told us that you went
5 to your office.

6 Did you -- did you shut the door when you

7 went to speak to him? Mr. Navas patched you through to

8 Mr. Bayad, do you remember that?

9 A. Yes.

10 Q. Let's back up.

11 Do you remember that you told me that you

12 spoke to Mr. Bayad personally the morning of his
13 interview?

14 A. Yes.

15 Q. Okay. Do you remember that you told me that
16 Mr. Navas effectively patched him through to you?

17 A. I asked Mr. Navas to --

18 Q. Transfer?

19 A. -- transfer the call into my office.

20 Q. All right. And did he, in fact, do that?

21 A. Yes.

22 Q. And did you have the conversation that we're
23 going to talk about in a moment with Mr. Bayad from
24 your office?

25 A. Yes, I did.

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1 Q. Was your office door open or closed?

2 A. It was closed.

3 Q. Was anyone else in the room during that
4 conversation?

5 A. No.

6 Q. Were you on the speaker phone?

7 A. No.

8 Q. Okay. Tell me what you -- is that the one

9 and only conversation that you had with Mr. Bayad
10 before he came to Largo that same day?

11 A. Yes, it was.

12 Q. Tell me what was said in that conversation.

13 A. The conversation essentially went, "Anthony,
14 I understand that you are not planning on coming to
15 Largo."

16 And he said "That's correct."

17 And I said, "Did you not understand that you
18 were to be here at 1:00?"

19 He said, "Yes, but I'm not going to come."

20 I asked him, "Why not?"

21 He said -- one time he said he had customers

22 that he was working and then another time he said,

23 "Unless you tell me the specific reason why you want
24 me to be there, I'm not coming."

25 And my response to him, to the best of my

1 recollection was, "Anthony, please listen to me very

2 carefully. I am giving you a work directive that I

3 want you here at this office as quickly as you can

4 possibly be here. Should you decide not to come, I am

5 going to view that as insubordination and you will

6 suffer the consequences thereof."

7 He then said, "Are you going to fire me?"

8 I then said, "I didn't say that. I just

9 need for you to be here as quickly as you possibly can."

10 Q. Was that the sum of the conversation?

11 A. Yes.

12 Q. Okay. Were those the exact words that you
13 used?

14 A. Exact words.

15 Q. Okay. You have admitted, have you not, in
16 paragraph 33 of your Answer, making the statement that
17 you, "didn't care if Mr. Bayad had to take a flying
18 carpet to Largo," and -- and language similar to that?

19 A. Yes, I admit that.

20 Q. All right.

21 A. I did not make that statement to Mr. Bayad.

22 Q. Okay. To whom did you make that statement?

23 A. I made that statement to Mr. Navas when he
24 told me something to the effect, "How do you expect him
25 to get here?"

calling me
Flying carpet

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1 Q. Okay. And in your conversation there, then,

2 with Mr. Bayad, you did not actually use that
3 language?

4 A. No.

5 Q. You do not deny, however, making a reference
6 specifically contrary to the language that you used in
7 the conversation with Mr. Bayad, "quickly," but that
8 he thought, if necessary, take a flying carpet? You do
9 not deny having said that?

10 A. I did not say it to Anthony Bayad, but I did

11 say it to Amado Navas.

12 Q. Where did you make that statement to
13 Mr. Navas?

14 A. Out on -- right adjacent to his office.

15 Q. All right. Did Mr. Navas, at that time, have
16 an enclosed office such as you did?

17 A. No, he did not.

18 Q. All right. Was it a work area which was
19 open?

20 A. Yes.

21 Q. Cubicle?

22 A. Yes.

23 Q. All right. With others in the -- in the same
24 area?

25 A. I believe so.

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Plants:

viii

240214524.

REPORTED BY: KEVIN P. MINES, RPH, RMR
Registered Merit Reporter
Notary Public - State of Florida
AT LARGE

1 The Deponent herein,
2 LEWIS KASLOW,
3 being first duly sworn to tell the truth, the
4 whole truth, and nothing but the truth, was
5 examined and testified as follows:
6 EXAMINATION
7 BY MR. SALES:
8 Q. What is your name, sir?
9 A. My name is Lewis Kaslow.
0 Q. And your date of birth?
1 A. Date of birth is 11-12-1948.
2 Q. Where do you reside?
3 A. I reside in Palm Harbor, Florida, and the
4 address is 4498 Fallbrook Boulevard, Palm Harbor,
5 Florida. The ZIP code is 34685.
6 Q. I was told by someone else that the Largo
7 facility for Lucent has moved. Is that correct?
8 A. That is correct.
9 Q. Where are you all now?
0 A. We are at the northern part of
1 St. Petersburg.
2 Q. What's the address there?
3 A. 11399 16th Court North.
4 MR. SAVASTANO: St. Petersburg, Florida,
5 33711.

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JOHN A. LEGON, ESQUIRE
Wallace, Bauman, Legon, Rodman & Sheanon
2223 Ponce de Leon Boulevard, Suite 600
Coral Gables, Florida 33134
Attorney for Defendants.

2 8 3 2 8

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Example

By Mr. Sales

DEPARTMENT SIGNATURE PAGE	226
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EXHIBITS

19	Plaintiff's Exhibit	1	(Marked After Deposition)
	Plaintiff's Exhibit	2	(Marked Prior to Deposition)
20	Plaintiff's Exhibit	2	(Marked After Deposition)
	Plaintiff's Exhibit	3	(Marked After Deposition)
21	Plaintiff's Exhibit	1	(Marked Prior to Deposition)
	Plaintiff's Exhibit	29	(Marked Prior to Deposition)
22	Plaintiff's Exhibit	36	(Marked Prior to Deposition)
	Plaintiff's Exhibit	32	(Marked Prior to Deposition)
23	Plaintiff's Exhibit	22	(Marked Prior to Deposition)
	Plaintiff's Exhibit	4	(Marked After Deposition)
24	Plaintiff's Exhibit	26	(Marked Prior to Deposition)

(All Exhibits Attached)

1 Q. And when did that occur?
2 A. The move occurred in a four phase move. We
3 actually started moving over there in late January and
4 it finished up in February.
5 Q. So it's up and running now?
6 A. It is up and running.
7 Q. Tell me what that facility is like.
8 A. That facility is very analogous to the Largo
9 Customer Care Center. We just moved it from the old
10 Paradyne facility over to a new facility. It is a
11 three story, 100,000 square foot facility where we
12 supply network management to data networking customers
13 as well as installation and support.
14 Q. And what is your title there?
15 A. My title there is General Manager of the
16 Tampa Bay NetCare Services Center.
17 Q. So that hasn't changed in the last 12 to 17
18 months?
19 A. No, it has not.
20 Q. Is there anybody above you at the office?
21 A. At the office?
22 Q. Resident in that facility.
23 A. At the time this all occurred, no.
24 Q. How about now?
25 A. Yes.